

1 **GEORGE M. RANALLI, ESQ.**

Nevada Bar No. 5748

2 **BENJAMIN J. CARMAN, ESQ.**

Nevada Bar No. 12565

3 **RANALLI ZANIEL FOWLER & MORAN, LLC**

2400 W. Horizon Ridge Parkway

4 Telephone: (702) 477-7774

Facsimile: (702) 477-7778

5 ranalliservice@ranallilawyers.com

Attorneys for Defendant

6 State Farm Mutual Automobile Insurance Company

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 **ETHAN ALAN ADAIR (FKA ALAN**
11 **VEYTSMAN), individually**

12 Plaintiff,

13 v.

14 **STATE FARM MUTUAL AUTOMOBILE**
15 **INSURANCE COMPANY, individually;**
16 **DOES I - X, and ROE**
17 **CORPORATIONS I - X,**

18 Defendant

2:17-cv-00421-RFB-CWH

*SUBMITTED IN COMPLIANCE
WITH LR 26-1(e)*

19 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**
20 **(SECOND REQUEST)**

21 Pursuant to Local Rules 6-1 and 26-4, the parties, by and
22 through their respective counsel of record, hereby stipulate to
23 and request that the Court extend the deadlines by ninety days.
24

A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:

The following discovery has been completed by the parties:

1. Plaintiff's List of Witnesses and Documents Produced Pursuant to FRCP 26 was produced on October 4, 2017;
2. Defendant's Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f) was produced on October 9, 2017;
3. Plaintiff's First Supplemental List of Witnesses and Documents Produced Pursuant to FRCP 26;
4. Plaintiff's Second Supplemental List of Witnesses and Documents Produced Pursuant to FRCP 26;
5. Defendant's First Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
6. Defendant's First Set of Interrogatories to Plaintiff
7. Defendant's First Set of Requests for Production of Documents to Plaintiff;
8. Defendant's First Set of Requests for Admissions to Plaintiff;
9. Plaintiff's First Set of Interrogatories to Defendant;
10. Plaintiff's First Set of Requests for Production of Documents to Defendant
11. Plaintiff's First Set of Requests for Admissions to Defendant;
12. Plaintiff has noticed the deposition of Nikki Clary;

13. Plaintiff has noticed the deposition of Sandra Gowdy;
14. Deposition of Plaintiff;
15. Defendant's Responses to Plaintiff's Requests for Admissions;
16. Plaintiff's Responses to Defendant's Request for Admissions;
17. Defendant's Responses to Plaintiff's Interrogatories;
18. Plaintiff's Responses to Defendant's First Set of Interrogatories;
19. Defendant's Responses to Plaintiff's Requests for Production of Documents;
20. Plaintiff's Responses to Defendant's First Set of Request for Production of Documents;
21. Plaintiff has noticed the deposition of the Person Knowledgeable of State Farm;
22. Defendant's Designation of Expert Witnesses;
23. Plaintiff's Designation of Expert Witnesses and Documents;

B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:

1. Depositions of the Person Most Knowledgeable from Plaintiff's medical providers relevant to treatment rendered to Plaintiff since the date of this accident;

- 1 2. Disclosures of Plaintiff and Defendant's rebuttal
- 2 experts;
- 3 3. Depositions of Plaintiff and Defendant's experts;
- 4 4. Obtaining Plaintiff's medical records;

5 **A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED**
6 **WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

7 Both parties have been working diligently to move this
8 matter forward and have noticed depositions and served
9 discovery, including their designation of experts in this
10 matter. Both parties are aware of the numerous depositions they
11 would like to take and the conflicting schedules of not only
12 counsel, but the deponents. In addition, the parties recently
13 exchanged expert disclosures and both parties believe they will
14 need more time to prepare their experts as well as retain
15 additional rebuttal experts. The parties are requesting a
16 ninety day extension to complete all remaining discovery and
17 depositions. This extension will allow the parties to
18 accommodate counsels' schedule as well as the remaining
19 deponents. Further, this will allow the parties to obtain the
20 necessary experts needed.

21 **D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	Old Deadline	New Deadline
23 Discovery Cut off:	07/16/2018	10/15/2018

Amending the Pleadings & Adding Parties:	04/17/2018	CLOSED
Expert Disclosure:	05/17/2018	CLOSED
Rebuttal of Experts:	06/15/2018	09/17/2018
Interim Status Report:	05/17/2018	08/16/2018
Dispositive Motions:	08/15/2018	11/14/2018
Pretrial Order:	09/14/2018	12/14/2018

**F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.**

Dated: May 29, 2018

Dated: May 29, 2018

RANALLI ZANIEL FOWLER & MORAN,
LLC

THE POWELL LAW FIRM

/s/ Benjamin Carman

/s/ Paul Powell

GEORGE M. RANALLI, ESQ.

PAUL D. POWELL, ESQ.

Nevada Bar No. 5748

Nevada Bar No. 7488

BENJAMIN J. CARMAN, ESQ.

MICHAEL A. KRISTOF, ESQ,

Nevada Bar No. 12565

Nevada Bar No. 7780

2400 W. Horizon Ridge Parkway

4435 South Eastern Avenue

Henderson, Nevada 89052

Las Vegas, Nevada 89119

Attorneys for Defendant

Attorney for Plaintiff

ORDER

IT IS SO ORDERED:

Dated: May 30, 2018


UNITED STATES DISTRICT COURT
MAGISTRATE JUDGE